

EXHIBIT 3

IN THE UNITED STATES DISTRICT COURT
IN AND FOR THE DISTRICT OF DELAWARE

TERRY L. SNYDER,)	
)	
Plaintiff,)	C.A. No. 04-970(JJF)
)	
v.)	
)	
CITISTEEL USA, INC.)	
)	
)	
Defendant.)	

AFFIDAVIT OF TERRY L. SNYDER

STATE OF DELAWARE)	
)	ss
COUNTY OF NEW CASTLE)	

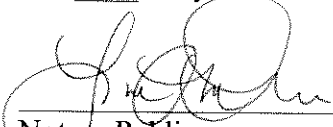
I, Terry Snyder, being duly sworn according to law, hereby depose and say as follows:

1. I am the Plaintiff in the above-captioned case.
2. I tape recorded a conversation that took place between Randolph Harris, the alleged harasser, and me while I was employed at Citi Steel. I also tape recorded a conversation that took place between Jerry Downie, the Human Resources Director for Citi Steel, and me during a meeting on my final day of employment.
3. While listening to the original tape(s), I reviewed the transcript of the conversation between Randolph Harris and me, as well as, the transcript of my meeting with Jerry Downie.
4. Some of the statements on Defendant's transcriptions of the tapes were inaccurate. Based on my review of the original tape(s), I made the appropriate edits to both transcripts.

5. The transcripts, with my edits, accurately reflect the tape recorded conversations that I had with both Randolph Harris and Jerry Downie.

6. I did not complete my review of the tapes in a timely fashion for two reasons. First, I am not trained in the area of transcription, therefore, it was very difficult to listen to the tapes and transcribe the respective conversations. Second, listening to the tapes was extremely upsetting because it was a constant reminder of my unfortunate experience while employed at Citi Steel.

SWORN TO AND SUBSCRIBED before
this 16th day of February, 2007.



Notary Public

